

**DEPARTMENT OF ENERGY**

Environmental Management Los Alamos Field Office (EM-LA)  
Los Alamos, New Mexico 87544

EMLA-2021-0018-02-001

December 10, 2020

Mr. Kevin Pierard  
Bureau Chief  
Hazardous Waste Bureau  
New Mexico Environment Department  
2905 Rodeo Park Drive East, Building 1  
Santa Fe, NM 87505-6313

Subject: Biennial Inspection and Maintenance Report on Erosion Controls in Drainages to the  
90s Line Pond at Technical Area 16

Dear Mr. Pierard:

This letter documents the annual inspection and maintenance of erosion control measures associated with the drainages entering the 90s Line Pond, Consolidated Unit 16-008(a)-99 for calendar years 2019 and 2020. This letter is required of the U.S. Department of Energy Environmental Management Los Alamos Field Office (EM-LA) and Newport News Nuclear BWXT-Los Alamos, LLC (N3B) as part of the New Mexico Environment Department's (NMED's) "Approval with Modifications [for the] Supplemental Investigation Work Plan for Consolidated Units 16-007(a)-99 and 16-008(a)-99 at Technical Area 16," dated December 31, 2008.

The individual solid waste management units within Consolidated Unit 16-008(a)-99 are located on a level, well-vegetated mesa top in Technical Area 16 (TA-16). Surface flows generated in the area discharge to the 90s Line Pond through two narrow drainage channels and have little potential to reach any waters of the United States. The 90s Line Pond was remediated in 2009 and has no outlet.

On November 16, 2016, the annual "Inspection and Maintenance of Erosion Controls in Drainages to the 90s Line Pond at Technical Area 16" was submitted to NMED. In that report, a request was made to reduce the report submittal schedule to once every two years and no later than December 31 of the reporting year. On December 30, 2016, NMED approved the annual inspection report and the request to submit reports biennially. The biennial inspection and maintenance report for calendar years 2017 and 2018 was submitted on December 17, 2018. This inspection report details activities performed during 2019 and 2020.

Best management practices were installed in 2008 in the drainages to the 90s Line Pond, consisting of five juniper bale controls designed to block sediment transport down the drainages into the pond. Controls were inspected annually on September 16, 2019, and September 17, 2020. The results indicate all controls are currently in good operating condition with no evidence of erosion in the drainages, as shown in the enclosed "Figures for the Biennial Inspection and Maintenance Report on Erosion Controls in Drainages to the 90s Line Pond at Technical Area 16" (Enclosure 1).

From the first inspection in 2009 to the inspection conducted in 2020, no evidence of erosion has been documented for 90s Line Pond drainages, including after a 3.52-in. rain event on September 13, 2013. The area has continued to remain in stable condition with no maintenance activities being required in over 11 years. Given the well-documented stability of the drainages and controls, EM-LA and N3B request that hereafter, the annual inspection and biennial reporting of erosion controls for 90s Line Pond drainages be discontinued and removed as a requirement from NMED's approval with modifications for the "Phase II Investigation Report for the Technical Area 16 (TA-16) 340 Complex, Revision 1," dated February 9, 2009.

If you have any questions, please contact Steve Veenis at (505) 309-1362 (steve.veenis@em-la.doe.gov) or Cheryl Rodriguez at (505) 414-0450 (cheryl.rodriguez@em.doe.gov).

Sincerely,

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Arturo Q. Duran  
Compliance and Permitting Manager  
Environmental Management  
Los Alamos Field Office

Enclosure(s):

1. Two hard copies with electronic files:  
Figures for the Biennial Inspection and Maintenance Report on Erosion Controls in Drainages to the 90s Line Pond at Technical Area 16 (EM2020-0562)

CC (letter and enclosure[s] emailed):

Laurie King, EPA Region 6, Dallas, TX  
Raymond Martinez, San Ildefonso Pueblo, NM  
Dino Chavarria, Santa Clara Pueblo, NM  
Chris Catechis, NMED-DOE-OB  
Steve Yanicak, NMED-DOE-OB  
Braidon Waggoner, LANL  
Felicia Aguilar, N3B  
William Alexander, N3B  
Don Carlson, N3B  
Emily Day, N3B  
Jeff Holland, N3B  
Kim Lebak, N3B  
Joseph Legare, N3B  
Dana Lindsay, N3B

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Public Reading Room (EPRR)  
PRS website

**Pamela T. Maestas**

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**From:** Martinez, Cynthia, NMENV <cynthia.martinez1@state.nm.us>  
**Sent:** Thursday, December 10, 2020 9:43 AM  
**To:** Pamela T. Maestas  
**Subject:** RE: Submittal to NMED on 12/10/2020 of Biennial Insp and Maint Rpt 90s Line Pond

Good Morning,  
Received.

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**From:** Pamela T. Maestas <pamela.maestas@em-la.doe.gov>  
**Sent:** Thursday, December 10, 2020 9:16 AM  
**To:** Pierard, Kevin, NMENV <Kevin.Pierard@state.nm.us>  
**Cc:** Dhawan, Neelam, NMENV <neelam.dhawan@state.nm.us>; Krambis, Christopher, NMENV <Christopher.Krambis@state.nm.us>; Catechis, Chris, NMENV <Chris.Catechis@state.nm.us>; Briley, Siona, NMENV <Siona.Briley@state.nm.us>; Martinez, Cynthia, NMENV <cynthia.martinez1@state.nm.us>; Emily M. Day <Emily.Day@em-la.doe.gov>; Regulatory Documentation <RegDocs@EM-LA.DOE.GOV>; Shannon M. Smith <Shannon.Smith@em-la.doe.gov>  
**Subject:** [EXT] Submittal to NMED on 12/10/2020 of Biennial Insp and Maint Rpt 90s Line Pond

Mr. Pierard,

Attached for submittal is a pdf of the following:

- Biennial Inspection and Maintenance Report on Erosion Controls in Drainages to the 90s Line Pond at Technical Area 16 (EMLA-2021-0018-02-001, letter and enclosure)

Please acknowledge receipt of this submittal by responding to this email.

Let me know if you have any questions.

Thank you.

**Pamela T. Maestas**  
**Regulatory Documentation Manager**  
Newport News Nuclear BWXT-Los Alamos, LLC  
c. 505-927-7882  
[regdocs@em-la.doe.gov](mailto:regdocs@em-la.doe.gov)



1200 Trinity Drive, Suite 150  
Los Alamos, NM 87544

**Figures for the Biennial Inspection and Maintenance Report on  
Erosion Controls in Drainages to the 90s Line Pond at Technical Area 16**



**Figure 1 Vegetated Consolidated Unit 16-008(a)-99 draining to  
90s Line Pond, September 2019**



**Figure 2 Vegetated Consolidated Unit 16-008(a)-99 draining to  
90s Line Pond, September 2020**





**Figure 3** Run-on control earthen berm in the vegetated area draining to 90s Line Pond, September 2019



**Figure 4** Run-on control earthen berm in the vegetated area draining to 90s Line Pond, September 2020





**Figure 5** Juniper bale check dams located in drainage channel to 90s Line Pond, September 2019. Note vegetation in channel.



**Figure 6** Juniper bale check dams located in drainage channel to 90s Line Pond, September 2020. Note vegetation in channel.





**Figure 7** Juniper bale check dam located in drainage channel to 90s Line Pond, September 2019. Note vegetation in channel.



**Figure 8** Juniper bale check dam located in drainage channel to 90s Line Pond, September 2020. Note vegetation in channel.





**Figure 9** Juniper bale check dam located in drainage channel to 90s Line Pond, September 2019. Note vegetation in channel.



**Figure 10** Juniper bale check dam located in drainage channel to 90s Line Pond, September 2020. Note vegetation in channel.





**Figure 11** Juniper bale check dam located in drainage channel to 90s Line Pond, September 2019. Note vegetation in channel.



**Figure 12** Juniper bale check dam located in drainage channel to 90s Line Pond, September 2020. Note vegetation in channel.





**Figure 13 90s Line Pond, September 2019**



**Figure 14 90s Line Pond, September 2020**